

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-27 and 29 were pending in this application. Claims 8, 21-29, and 32 have been cancelled by this reply without prejudice or disclaimer. Of the pending claims, claims 1 and 12 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 12.

Claim Amendments

Independent claims 1 and 12 have been amended to clarify the invention. Specifically, claims 1 and 12 have been amended to clarify that the invention includes: (i) a first network; (ii) a data acquisition device connected to the first network; (iii) a second network; (iv) a mobile data acquisition unit *consisting of* a router and at least one host; (v) that the router is configured to communicate with the at least one host; (vi) that the at least one host is configured to communicate with the data acquisition device through the first network; and (vii) *that the router isolates the at least one host and the data acquisition device from the second network*. Support for the aforementioned amendments may be found, for example, in Figure 1 and page 10 of the referenced application.

Further, dependent claims 2, 3, 9, 10, 13-15, and 18-20 have been amended to address antecedent basis issues arising from the amendments made to independent claims 1 and 12 as well

as to correct minor typographical and grammatical errors. No new matter has been added by any of the aforementioned amendments.

Rejection(s) under 35 U.S.C. §103

Claims 1-10, 12-19, and 23-26 stand rejected under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. 6,778,523 (“Masilamany”) in view of U.S. Patent No. 6,286,038 (“Reichmeyer”). Claims 8 and 23-26 have been cancelled by this reply. Accordingly, this rejection is now moot with respect to the cancelled claims. To the extent that the rejection applies to the pending claims, the rejection is respectfully traversed.

As discussed above, independent claims 1 and 12 has been amended to clarify that the invention includes: (i) a first network; (ii) a data acquisition device connected to the first network; (iii) a second network; (iv) a mobile data acquisition unit *consisting of* a router and at least one host; (v) that the router is configured to communicate with the at least one host; (vi) that the at least one host is configured to communicate with the data acquisition device through the first network; and (vii) *that the router isolates the at least one host and the data acquisition device from the second network.*

Thus, amended independent claim 1 requires that the mobile data acquisition unit *only* includes a single router and one or more hosts*. Further, the router isolates both the data acquisition device and the host(s) in the mobile data acquisition unit from the second network. Said another way, the router is interposed between the second network and the devices connected to the first

network (*i.e.*, the host(s) and the data acquisition device) such that all communications external to the first network are routed through the router.

Thus, if a host on the second network sends a packet to the host in the mobile data acquisition unit, the packet passes through the router before being forwarded from the router to the host in the mobile data acquisition unit. Similarly, if the host in the mobile data acquisition unit sends a packet to the host on the second network, the packet must pass through the router, which then forwards the packet to the host on the second network. In both cases, these devices on the first network (*i.e.*, the host(s) and the data acquisition device) are unable to *directly* communicate with any other device external to the first network.

Further, as recited in the claims, the host(s) in the mobile data acquisition unit includes functionality to configure the router to communicate with the second network. Thus, the host(s), which configures the router, is *only* able to communicate with devices on the first network and may *only* communicate with the second network through the single router in the mobile data acquisition device. Accordingly, the host(s) may be connected to at most one router, where the router is used to isolate the at least one host and the data acquisition unit from the second network.[†]

Turning to the rejection, “[t]o establish a *prima facie* case of obviousness...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (*See* MPEP §2143). The Applicant respectfully asserts that the cited references do not teach or suggest the mobile data acquisition unit as recited in the amended claims.

* The phrase “consisting of” explicitly limits the mobile data acquisition unit to a single router (*see* MPEP § 2111.03).

† The fact that the mobile data acquisition unit may only include a single router does not preclude a second router attached to the first network.

Specifically, Masilamany teaches a system in which a service controller (S in Figure 1 of Masilamany) includes functionality to configure multiple routers connected to multiple networks (See Masilamany, Figure 1). The Applicant respectfully asserts that there is no element (or group of elements) in Masilamany that could be reasonably construed to be equivalent to a mobile data acquisition unit as recited in the amended claims. In particular, the only component in Masilamany that includes functionality to configure routers is the service controller (S in Figure 1 of Masilamany). As discussed above, the mobile data acquisition unit may only include a single router and at least one host. Further, the at least one host in the mobile data acquisition unit includes functionality to configure the single router, such that the at least one host and/or the data acquisition device can communicate with the second network. Thus, the service controller, which communicates with multiple routers, is not equivalent to the at least one host.

Moreover, the service controller is not connected to a first network and isolated from a second network. Rather, the service controller may directly communicate with multiple networks via multiple routers. In contrast, the claims require that the host(s) and data acquisition device are connected to a first network and are isolated from a second network by a router. Thus, conceptually, both the host and the data acquisition device are on “one side” of the router and the second network is on the “other side” of the router. Clearly, the service controller in Masilamany is on “one side” of the router and the networks are on the “other side” of the router.

Further, Reichmeyer does not supply that which Masilamany lacks. Specifically, Reichmeyer teaches a central management system (24 in Figure 3 of Reichmeyer) configured to program multiple routers (*e.g.*, 60, 62, and 64 in Figure 3 of Reichmeyer). As shown in Figure 3 of

Reichmeyer, the central management system is configured to interact *directly* with multiple routers (e.g., 60, 62, and 64 in Figure 3 of Reichmeyer). The Applicant respectfully asserts that there is no element (or group of elements) in Reichmeyer that could be reasonably construed to be equivalent to a mobile data acquisition unit as recited in the amended claims.

In particular, the only component in Reichmeyer that includes functionality to configure routers is the central management system. As discussed above, the mobile data acquisition unit may only include a single router and at least one host. Further, the at least one host in the mobile data acquisition unit includes functionality to configure the single router such that the at least one host and/or the data acquisition device can communicate with the second network. Thus, the central management system, which communicates with multiple routers, is not equivalent to the at least one host.

Moreover, the central management system is not connected to a first network and isolated from a second network. Rather, the service controller may *directly* communicate with multiple routers (e.g., 60, 62, and 64 in Figure 3 of Reichmeyer). In contrast, the claims require that the host(s) and data acquisition device are connected to a first network and are isolated from a second network by a router. Thus, conceptually, both the host and the data acquisition device are on “one side” of the router and the second network is on the “other side” of the router. Reichmeyer provides no such isolation for the central management system. Specifically, while the central management system is connected to a configuration domain border router (60 in Figure 3 of Reichmeyer) the central management system may also communicate directly with sub-domain routers (62 and 63 in

Figure 3 of Reichmeyer). Accordingly, there is no single router isolating the central management system from other networks.

In view of the above, Masilamany and Reichmeyer, whether considered separately or in combination, fail to teach or suggest all the limitations of amended independent claims 1 and 12. Pending dependent claims are patentable over Masilamany and Reichmeyer for at least the same reason. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 29 stands rejected under 35 U.S.C. § 103 as being unpatentable over Masilamany, Reichmeyer and U.S. Patent No. 6,298,057 (“Guy”). Claim 29 has been cancelled by this reply. Thus, this rejection is moot. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 11, 20, and 27 stand rejected under 35 U.S.C. §103 as being unpatentable over Masilamany, Reichmeyer and U.S. Patent No. 5,802,278 (“Isfled”). Claim 27 has been cancelled by this reply. Accordingly, this rejection is now moot with respect to claim 27. To the extent that this rejection applies to the pending claims, the rejection is respectfully traversed.

Claims 11 and 20 depend from independent claim 1 and 12, respectively. As discussed above, neither Masilamany nor Reichmeyer teaches or suggests all the limitations of independent claims 1 and 12. Further, Isfled does not teach or suggest that which Masilamany and Reichmeyer lack. This is evidenced by the fact that Isfled is only relied upon to teach “configuring the router not to send address of nodes in the first network to other routers” (Office Action mailed May 16, 2006, p. 8).

Thus, Masilamany, Reichmeyer, and Isfled, whether viewed separately or in combination, fail to teach or suggest all limitations of independent claims 1 and 12. Therefore, independent

claims 1 and 12 are patentable over Masilamany, Reichmeyer, and Isfled. Dependent claims 11 and 20 are patentable over Masilamany, Reichmeyer, and Isfled for at least the same reasons as presented above. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 30-32 stand rejected under 35 U.S.C. §103 as being unpatentable over Masilamany, Reichmeyer and Applicant Admitted Prior Art (“AAPA”). Claim 32 has been cancelled by this reply. Accordingly, this rejection is now moot with respect to claim 32. To the extent that this rejection applies to the pending claims, the rejection is respectfully traversed.

Claims 30 and 31 depend from independent claim 1 and 12, respectively. As discussed above, neither Masilamany nor Reichmeyer teaches or suggests all the limitations of independent claims 1 and 12. Further, AAPA does not teach or suggest that which Masilamany and Reichmeyer lack. This is evidenced by the fact that AAPA is only relied upon to teach that “the data acquisition device comprises a down-hole transmitter” (Office Action mailed May 16, 2006, p. 8).


Thus, Masilamany, Reichmeyer, and AAPA, whether viewed separately or in combination, fail to teach or suggest all limitations of independent claims 1 and 12. Therefore, independent claims 1 and 12 are patentable over Masilamany, Reichmeyer, and AAPA. Dependent claims 30 and 31 are patentable over Masilamany, Reichmeyer, and AAPA for at least the same reasons as presented above. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09428/184001).

Dated: August 16, 2006

Respectfully submitted,

By 
T. Chyau Liang, Ph.D.
Registration No.: 48,885
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant